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ATTORNEYS FOR  
SCOTT M. SEIDEL, TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In re:	§	
	§	Chapter 7
WITH PURPOSE, INC.,	§	
	§	Case No. 23-30246-mvl-7
Debtor.	§	

**TRUSTEE'S WITNESS AND EXHIBIT LIST**  
**FOR HEARING ON MAY 19, 2025**

Scott M. Seidel (the "Trustee"), the duly appointed chapter 7 trustee in the above-styled and captioned bankruptcy case, hereby submits this Witness and Exhibit List for the hearing (the "Hearing"), currently scheduled for **May 19, 2025, at 1:30 p.m.**, in connection with *Toby Neugebauer's Second Motion to Allow Payment and/or Advancement of Defense Costs and Other Losses Under Directors and officers Insurance Policy and, In the Alternative, Motion for Relief From the Automatic Stay* [Docket No. 485] and his *Brief In Support* [Docket No. 486].

**WITNESSES**

The Trustee designates the following witnesses that may be called during the Hearing:

1. Toby Neugebauer;
2. Any witness necessary for impeachment or rebuttal; and
3. Any witness called or listed by any other party.

**EXHIBITS**

The Trustee designates the following exhibits that may be used at the Hearing. The Trustee reserves all rights to introduce and/or request judicial notice of any or all of the following Exhibits as evidence at the Hearing, each as may be amended, and expressly including any filed responses thereto, and any exhibits, schedules, addenda, and any and all other attachments or amendments thereto and thereof. The Trustee reserves the right to amend or supplement this List as may be appropriate.

- A. Insurance Policy Number 8262-7893 issued by Federal Insurance Company (Chubb)
- B. Insurance Policy Number 02-359-39-91 issued by National Union Fire Insurance Company of Pittsburgh, Pa. (AIG)
- C. Claim Number 46-1 filed by Rhythmic Capital Fund II, LLC
- D. Claim Number 47-1 filed by Seven Talents, LLC
- E. Claim Number 48-1 filed by Ayers Family Holdings, LLC
- F. Claim Number 49-1 filed by the J. Nicholas Ayers 2021 Irrevocable Trust
- G. Letter from Nick Ayers to the With Purpose, Inc. Board of Directors dated April 5, 2022
- H. Letter from Richard Porter to the With Purpose, Inc. Board of Directors dated April 12, 2022
- I. *Nick Ayers' Original Counterclaim and Third-Party Claimants' Original Statement of Claims* in JAMS Arbitration No. 5310000148
- J. *Plaintiffs' Original Petition* filed by Seven Talents, LLC, Rhythmic Capital Fund II, LLC, and J.I.G., LLC in Cause No. DC-23-02970
- K. Invoice from Locke Lord to the Special Committee of GloriFi, Inc. dated June 7, 2022, Invoice No. 1727200 (Trustee\_MRS\_000004)
- L. Invoice from Locke Lord to the Special Committee of GloriFi, Inc. dated July 7, 2022, Invoice No. 1733213 (Trustee\_MRS\_000021)
- M. *Trustee's First Set of Discovery to Toby Neugebauer in Connection with Second Motion for Relief From Stay* served on April 30, 2025

- N. All exhibits designated or offered by any other party at the Hearing
- O. Any exhibit necessary for impeachment or rebuttal.

The Trustee reserves the right to supplement or amend this Witness and Exhibit List at any point prior to the Hearing.

RESPECTFULLY SUBMITTED this 16th day of May, 2025.

By: /s/ *Conor White*  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this the 16th day of May, 2025, true and correct copies of this document were electronically served by the Court's CM/ECF system on parties entitled to notice thereof.

By: /s/ *Conor White*  
Conor P. White, Esq.